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June 20, 2014

VIA ECF
ORIGINAL BY HAND

Hon. William E. Smith
Chief Judge
United States District Court for the District of Rhode Island
Federal Building and Courthouse
One Exchange Terrace
Providence, RI 02903

Re: In re Loestrin 24 Fe Antitrust Litigation, C.A. No. 1:13-md-02472-M-PAS,
on behalf of all Defendants – ALL CASES

Dear Chief Judge Smith:

This firm, together with White & Case LLP, represents Defendants Warner Chilcott Sales (US), LLC, Warner Chilcott (US), LLC, Warner Chilcott Public Limited Company, Warner Chilcott Company, LLC f/k/a Warner Chilcott Company, Inc., Warner Chilcott Laboratories Ireland Limited, Warner Chilcott Holdings Company III, Ltd., Warner Chilcott Corporation, Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc., and Watson Laboratories, Inc. LLC (collectively, the “Actavis Defendants”) in the above-referenced matters. We are writing, on behalf of the Actavis Defendants and Defendants Lupin Pharmaceuticals, Inc. and Lupin Ltd. (together, the “Lupin Defendants”), in response to Plaintiffs’ letter of June 18, 2014 suggesting time limitations for oral argument during the Friday June 27, 2014 hearing on Defendants’ motions to dismiss the direct purchaser and indirect purchaser complaints.

As Plaintiffs acknowledge in their June 18th letter, Defendants had proposed longer time periods to Plaintiffs. Specifically, Defendants had proposed with respect to the federal claims or issues, which would include the *Actavis* issues raised in the direct purchaser and indirect purchaser complaints, statute of limitations, and market power, one hour of argument for all Defendants and one hour of argument for all Plaintiffs. Defendants had further proposed with respect to the state law claims, which are specific to the indirect purchaser complaint, 45 minutes of argument for all Defendants and 45 minutes for all Plaintiffs.

Defendants agree with Plaintiffs that 30 minutes of argument for each of Plaintiffs and Defendants (for a total time of one hour) on the state law issues may be sufficient. However, Defendants submit that Plaintiffs’ proposed time limitations of 30 minutes of argument for each of Plaintiffs and Defendants (for a total time of one hour) on the federal claims and issues – which Plaintiffs characterize as the “cross cutting liability issues” – would be insufficient for a

ADLER POLLOCK & SHEEHAN P.C.

Hon. William E. Smith

June 20, 2014

Page 2

productive discussion of these issues. Defendants respectfully submit that one hour per side would be more appropriate. Under Defendants' proposed time limits, Friday's hearing would conclude at approximately 5:00 p.m.

Defendants hasten to add that they are happy to proceed with whatever structure the Court would find most helpful. Defendants look forward to the Court's guidance.

Respectfully,



JOHN A. TARANTINO

cc: All Counsel of Record (via ECF)

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